

Robert D. Lillienstein, Esq. (rlillienstein@mosessinger.com)
Jordan Greenberger, Esq. (jgreenberger@mosessinger.com)
MOSES & SINGER LLP
Attorneys for Defendants
The Chrysler Building
405 Lexington Avenue
New York, New York 10174
(212) 554-7800 (telephone)
(212) 554-7700 (facsimile)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARTHUR ANGERMEIR, NITESH BHAGWANANI,
KEN ELDER, BECKY D. GLYNN, RAJAT GOYAL,
KRISTINA GREENE, LOUIS MARROU, MARILYN
MURRELL, AND DR. SHIVA NANCY SHABNAM,

Plaintiffs,

– against –

JAY COHEN, SARA KRIEGER, JENNIFER CENTENO,
LOUIS CUCINOTTA, RICARDO BROWN, ROBERT
TAYLOR, JOSEPH I. SUSSMAN, JOSEPH I.
SUSSMAN, P.C., LEASE FINANCE GROUP, LLC, MBF
LEASING LLC and NORTHERN LEASING SYSTEMS,
INC.,

Defendants.

12 Civ. 0055 (KBF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Court's Order, dated March 31, 2015 (ECF No. 98), and the Declaration of Robert Lillienstein, dated April 7, 2015 (with exhibits), the undersigned counsel for Defendants moves this Court, before the Honorable Katherine. B. Forrest, U.S.D.C. J., in Courtroom 15A at the United States Courthouse located at 500 Pearl St., New York, NY 10007, for and Order:

(1) Entering a judgment dismissing all claims asserted in this action by Plaintiff Arthur Angermeir, with prejudice, together with costs and disbursements to Defendants;

(2) Awarding defendant/counterclaimant MBF Leasing LLC (“MBF”) a money judgment in its favor and against Arthur Angermeir for \$3,680, plus interest from February 1, 2009 on MBF’s counterclaim against Arthur Angermeir;

(3) Scheduling an inquest to calculate the attorneys’ fees and expenses to which MBF is contractually entitled on its counterclaim against Arthur Angermeir;

(4) Awarding Defendants fees and costs they have incurred as of March 6, 2015 in connection with Mr. Angermeir’s failure to produce initial disclosures, including the fees and costs associated with bringing the issue to the Court’s attention; and,

(5) granting such other and further relief as the Court deems just.

Dated: April 7, 2015
New York, New York

/s/

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